March 17, 2025

BY ECF

Honorable Henry J. Ricardo United States Magistrate Judge Southern District of New York 500 Pearl Street, Room 701 New York, New York 10007

> RE: *In re Amgen Inc. Securities Litigation*, Case No. 1:23-cv-02138-JPC-HJR

Dear Judge Ricardo:

Pursuant to this Court's January 16, 2025 Order (ECF No. 74, the "Case Management Plan"), the parties jointly submit this letter to update the Court on the status of the above-captioned action.

The parties are engaged in discovery pursuant to the schedule set forth in the Case Management Plan. On January 6, 2025, the parties exchanged their initial disclosures. On February 13, 2025, following the parties' meet and confer process, the parties submitted, and on February 14, 2025 the Court entered, the: (i) Stipulation & Order Governing The Treatment Of Confidential Information (ECF No. 78); (ii) Stipulation & Order Governing Electronic And Hard Copy Discovery (ECF No. 79); and (iii) Stipulation & Order Governing Deposition Protocol (ECF No. 80).

On February 18, 2025, the parties exchanged their initial requests for production and initial interrogatories (collectively, "Initial Requests"). The parties' respective responses and objections to the Initial Requests are due on March 20, 2025, after which point the parties expect to meet and confer regarding the appropriate scope of production in response to the Initial Requests. On February 24, 2025, the parties began serving subpoenas on third parties. A total of seven third party subpoenas have been served to date.

The parties do not currently have any disputes or issues to raise with the Court at this time. We are available to discuss any questions.

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Respectfully Submitted,

/s/ Evan J. Kaufman

EVAN J. KAUFMAN

SAMUEL H. RUDMAN EVAN J. KAUFMAN MARK T. MILLKEY AVITAL O. MALINA SKYLER J. SANDS JASON R. EDELMAN ROBBINS GELLER RUDMAN & DOWD LLP 58 South Service Road, Suite 200 Melville, New York 11747 Telephone: (631) 367-7100 Facsimile: (631) 367-1173 srudman@rgrdlaw.com ekaufman@rgrdlaw.com mmillkey@rgrdlaw.com amalina@rgrdlaw.com ssands@rgrdlaw.com

Lead Counsel for Lead Plaintiff

jedelman@rgrdlaw.com

cc: All counsel of record via ECF

/s/ Jay B. Kasner

JAY B. KASNER

JAY B. KASNER
PETER MORRISON
TANSY WOAN
MICHAEL W. RESTEY JR.
SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Telephone: (212) 735-3000
Facsimile: (212) 735-2000
jay.kasner@skadden.com
tansy.woan@skadden.com
michael.restey@skadden.com

-and-

200 Avenue of the Stars, Suite 200N Los Angeles, CA 90067 Telephone: (213) 687-5000 Facsimile: (213) 687-5600 peter.morrison@skadden.com

Attorneys For Defendants Amgen Inc., Robert A. Bradway and Peter H. Griffith